

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**AMAZON.COM, INC and AMAZON
DATA SERVICES, INC.,**

Plaintiffs,

v.

**WDC HOLDINGS LLC d/b/a
NORTHSTAR COMMERCIAL
PARTNERS, et al.,**

Defendants,

Case No. 1:20cv484

**Hon. Rossie D. Alston, Jr.
Hon. Ivan D. Davis**

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

**BRIAN WATSON, WDC HOLDING
LLC, PLW CAPITAL I,
LLC.AMAZON.COM, INC, and
AMAZON DATA SERVICES, INC.**

Interpleader Defendants.

**DEFENDANT CARLETON NELSON’S
MOTION TO COMPEL PLAINTIFFS’
SUPPLEMENTATION OF ITS
RESPONSE TO REQUEST FOR
PRODUCTION 4**

COMES NOW Defendant Carleton Nelson through undersigned counsel, and moves, pursuant to Fed. R. Civ. P. 37(a)(1) and Local Rule 37(A), for an Order compelling Plaintiffs to produce in response to his request for production number 4—which requests “All DOCUMENTS evidencing any procurement policies, processes, or procedures applicable to LEASE TRANSACTIONS or land purchases made by YOU” the following: (1) the new procurement policy for developers it implemented the same month it filed this lawsuit (which policy appears to mirror the conduct alleged to have occurred in this action): (2) the internal non-privileged

communications related to the implementation of this new policy; (3) the certifications provided by any developer under this new policy that identified Nelson (of which Nelson is aware of two that have not been disclosed in discovery by Amazon); (4) Amazon's internal non-privileged discussions of those responsive certifications; and (5) any further follow-up with those specific responding developers. This motion is supported by Nelson's brief in support of the motion, the declarations of Carleton Nelson and Adam R. Smart and exhibits thereto, and all matters of record.

MEET-AND-CONFER CERTIFICATION

Counsel for Defendant Nelson certifies that he conferred in good faith with counsel for Plaintiffs via numerous emails and telephone calls on these matters. The parties were unable to resolve the matter and Amazon refused to provide any of the requested information.

December 23, 2022

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/s/ Rachel Friedman

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Attorneys for Carleton Nelson

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2022, a true and correct copy of the foregoing has been served upon all parties of record via the ECF system and via email

Dated: December 23, 2022

/s/ Rachel Friedman
Rachel Friedman